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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

READING ROCK NORTHEAST,
LLC,

Plaintiff,

v.

WILLIAM N. RUSSELL III *et al.*

Defendants.

Civil Action No. 1:20-CV-5728

**CERTIFICATION OF PATRICK J.
KEARNEY IN SUPPORT OF
MOTION FOR ADMISSION *PRO
HAC VICE* OF JEFFREY M. NYE**

I, Patrick J. Kearney, being of full age, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and partner with the law firm of Duane Morris LLP, counsel for Reading Rock Northeast, LLC (“Reading Rock”) in this action.

I submit this Certification in support of the application for an Order permitting Jeffrey M. Nye of

the law firm of Stagnaro, Saba & Patterson Co., LPA, 2623 Erie Avenue, Cincinnati, OH 45207, to appear *pro hac vice* in this action and participate on behalf of Reading Rock.

2. Pursuant to L. Civ. R. 101(c), as part of this application, Mr. Nye is submitting a certification disclosing each bar in which he is a member in good standing and certifying that no disciplinary proceedings are pending against him in any jurisdiction and that no discipline has previously been imposed in any jurisdiction.

3. My firm has previously entered its appearance as counsel for Plaintiff Reading Rock in this action as required by L. Civ. R. 101.1(c).

4. For the foregoing reasons, and for the reasons set forth in the Certification of Mr. Nye, Reading Rock respectfully requests that the Court admit Mr. Nye as counsel *pro hac vice* in this matter.

Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing statements made by me are true and correct.

/s/ Patrick J. Kearney
Patrick J. Kearney, Esquire

Dated: July 20, 2020